

RECEIVED

**Spokane County Fire District No. 9** APR 27 1993

W. 14 Graves Road • Spokane, Washington 99218  
Telephone (509) 466-4602 • FAX (509) 466-4698

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

April 20, 1993

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W. - Room 222  
Washington, DC 20554

RECEIVED

APR 27 1993

FCC - MAIL ROOM

RE: PR Docket No. 92-235

Dear Ms. Searcy:

I am writing in opposition to the reframing proposal before the commission as FCC Docket 92-235. Our eastern Washington fire district operates a regional communications center serving six rural fire districts in northern Spokane County and eastern Stevens County, and we have three primary concerns with this proposal:

The first concern is that low-power transmitter requirements are **operationally impractical** for a regional communications center in mountainous terrain requiring wide-area coverage from portable radios to a dispatch center.

Secondly, this proposal would **severely impact** our county, regional, state and federal (BIFC fire cache radios) **mutual aid and disaster radio communications systems**. Plans would become obsolete, and inter-operability of regional fire resources radio equipment would make coordination difficult and ineffective. In October 1991 we experienced a major fire disaster requiring fire response from three states and the federal government.

Finally, should the FCC choose to adopt the proposed change, it will mandate a **complete replacement of our radio backbone**, site location, mobiles, portables and approximately 400 pagers. The engineering and capital costs of replacement must be planned for and financed through a bond issue or special levy, and would be subject to our ability to sell our citizens on the need. How can we do this when we aren't convinced ourselves? It is our view that, should the FCC **mandate** such a change, it should provide a reasonable 10-year **phase-in** period and actively work with state and federal agencies to make grants and other funding schemes available to public agencies required to change.

In summary, while technically this concept of reframing may have some merit, it **fails to address the requirements of a regional communications center** operating in mountainous terrain of eastern Washington and it would cause sever inter-operability problems for our fire service when working mutual aid, or with state and federal resources. We also believe the time frame for implementation is unrealistic and creates a very heavy financial burden on local government.

If the FCC truly considers public emergency services a high priority for communications and frequency allocation, then why are we being forced to spend millions of dollars to provide more frequency spectrum for television, radio and other commercial users who will profit at the taxpayers expense?

Sincerely,

